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March 10, 2021

**Via ECF Only**

Honorable Paul Crotty  
United States District Court Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY. 10007

3/16/2021

The motion is withdrawn as requested. An in-person change of plea hearing is set for Tuesday, March 23, 2021 at 3PM. Time will be excluded through March 23, 2021.  
SO ORDERED.



Re: U.S. v. Zhen, et. Al.  
Case ~~19-cr-5f6~~(PAC)  
20cr56

Your Honor,

My office represents Mr. Guzman, a defendant in the above referenced matter. Mr. Guzman has provided the Government written notice that he has agreed to accept their offer and I have signed the plea agreement dated February 17, 2021. I hereby withdraw my previously filed motions and request that the Court calendar this matter for a time at which my client and I can appear in Court together to enter the plea of guilty.

I have provided the AUSAs on this matter with dates and times next week where I can appear depending on when the court is available and Mr. Guzman can be produced by the Marshals from the MCC.

Counsel further agrees and requests that time, pursuant to the Speedy Trial Act, be excluded until the adjourned conference date set by the Court. The Court's consideration of this request is respectfully appreciated.

Thank you.

Yours truly,

Michael D. Horn.

Michael D. Horn, Esq.

Counsel for the Guzman-Martinez

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cc: AUSA Aline Flodr (via ECF)  
All Defense Counsel (via ECF)